

EXHIBIT G



**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

**IN RE: METHYL TERTIARY BUTYL
ETHER ("MTBE") PRODUCTS
M21-88
LIABILITY LITIGATION**

This document relates to:

Commonwealth of Puerto Rico, et al.
v.
Shell Oil Co., et al.,
Case No. 07-CIV-10470 (SAS)

**Master File No. 1:00-1898
MDL 1358 (SAS)**

**NOTICE OF DEPOSITION OF
DEFENDANTS PUERTO RICO SUN
OIL COMPANY, SUNOCO, INC.,
SUNOCO, INC. (R&M) ON
DESIGNATED ISSUES WITH
PRODUCTION OF
DOCUMENTS & VIDEOTAPING**

TO ALL PARTIES AND THEIR ATTORNEY(S) OF RECORD:

PLEASE TAKE NOTICE that, pursuant to Rule 30(b)(6) of the Federal Rules of Civil Procedure, Plaintiffs the Commonwealth of Puerto Rico and the Commonwealth of Puerto Rico through the Environmental Quality Board (collectively, "Plaintiffs" or "Commonwealth") will take the oral deposition of the following Defendants: PUERTO RICO SUN OIL COMPANY, SUNOCO, INC., SUNOCO, INC. (R&M) on designated issues set forth below, on November 12, 2013, at 9:30 a.m. at the offices of the Department of Justice: Departamento de Justicia, 9th Floor, Calle Olimpo, Esq., Axtmayer, Pda. 11 Miramar, San Juan, Puerto Rico. The depositions will continue from day to day, weekends and holidays excepted, until completed.

Pursuant to Rule 30(b)(6) of the Federal Rules of Civil Procedure, each Defendant shall designate and produce at the deposition those of its officers, directors, managing agents, employees, or agents who are most qualified to testify on its behalf as to those matters set forth in this Notice under the heading "Designated Issues" to the extent any information known or reasonably available to each Defendant. Pursuant to the Case Management Order Protocol Governing Rule 30(b)(6) Depositions dated December 6, 2012, each Defendant shall, not later

than seven (7) business days prior to the deposition, provide Plaintiffs (1) the names and titles of the persons designated to give testimony; (2) the areas in which each designated person will give testimony; (3) all documents reviewed by the witness(es) in preparation for the deposition; and (4) all documents described in the section of this notice entitled "Request for Production of Documents."

The depositions will be recorded stenographically and on videotape. These depositions may be used as evidence at trial.

DEFINITIONS

1. "CATANO TERMINAL" means the facility located, or formerly located, at PR-28, KM 0.8 in Guaynabo, Puerto Rico, and includes all assets and facilities, tank farms and other storage facilities, refining and blending operations equipment, truck racks, loading docks and other owned and non-owned assets and equipment.

2. "COMMINGLED GASOLINE" means GASOLINE that has been stored for any period of time in any storage tank used simultaneously by more than one entity for the storage of GASOLINE.

3. "DOCUMENT" or "DOCUMENTS" as defined in the Local Rules is synonymous in meaning and equal in scope to the usage of this term in Rule 34(a) of the Federal Rules of Civil Procedure, including but not limited to electronic or computerized data compilations and electronic mail subject to YOUR possession, custody, or control.

4. "GASOLINE" means any gasoline or component of gasoline, including but not limited to methyl tertiary butyl ether ("MTBE"), ethyl benzene, benzene, toluene, xylenes (collectively, "BTEX"), tert-butyl alcohol ("TBA"), and/or tert-amyl methyl ether ("TAME").

5. "GUAYANILLA TERMINAL" means the facility located, or formerly located, at PR-127, Km 17.3 in Peñuelas, Puerto Rico, and includes all assets and facilities, tank farms and other storage facilities, refining and blending operations equipment, truck racks, loading docks and other owned and non-owned assets and equipment.

6. "GUAYAMA PETROCHEMICAL PLANT" means the petrochemical plant located, or formerly located, at Road 710 in Guayama, Puerto Rico, and includes all plant assets and facilities, tank farms and other storage facilities, refining and blending operations equipment, truck racks, loading docks and other owned and non-owned assets and equipment.

7. "MTBE" means Methyl Tertiary Butyl Ether.

8. "PERSON" means any natural person, company, corporation, association, partnership and/or other legal entity.

9. "RELEVANT TIME PERIOD" means the period from January 1, 1979, to the present.

10. "RELEASE" and "RELEASED" mean any spilling, leaking, emitting, discharging, escaping, leaching, or disposing MTBE and/or gasoline into or on land, water, or subsurface soil, including vapor releases, and continuous, low-level releases.

11. "REMEDIATE" and "REMEDIATION" mean action to clean up, mitigate, correct, abate, minimize, eliminate, control, or prevent the presence, spreading, migration, leaking, leaching, volatilization, spilling, or transport of hazardous substance or further release of a hazardous substance into the environment.

12. "TBA" means Tertiary Butyl Alcohol.

13. "TRIAL SITES" mean:

SITE ID	Current Site Name	Address	Municipality
N/A	Chevron Phillips Chemical Puerto Rico Core LLC Petrochemical Facility	Road 710	Guayama
86-0948	Shell # 003042	Rd. #487 Villa Del Rey	Caguas
86-1075	Esso CO-364	Esq. Villa & Cementerio St.	Ponce
86-1232	Esso CO-242	Calle Antonio R. Barcelo #1	Cayey
91-0067	Total 1012	Central Avenue #263	San Juan
86-1825	Texaco #800 – Costancia S/S	Rd. #133, Km. 0.8, Urb. Constancia	Ponce
89-0156	Manati Municipal Garage	Rd. 685, Km. 0.1	Manati
98-0080	Maysonet Service Station	Carr. #682, Km. 3.1	Barceloneta
S4C030 W	Pozo Club de Leones	Carr. 103 Km. 4.3, Bo. Bajuras	Cabo Rojo
E12004 W	Guayama Urbano Filt. Plant	Calle Miraflores Final	Guayama

14. "YABUCOA FACILITY" means the refinery located, or formerly located, at Route 901, Km 2.7 in Yabucoa, Puerto Rico, and includes all assets and facilities, tank farms and other storage facilities, refining and blending operations equipment, truck racks, loading docks and other owned and non-owned assets and equipment.

15. "MARINE TERMINAL" means the facilities located at CATANO TERMINAL, GUYANILLA TERMINAL, GUAYAMA PETROCHEMICAL PLANT, YABUCOA FACILITY.

16. "SUNOCO" means Puerto Rico Sun Oil Company, Sunoco, Inc., Sunoco, Inc. (R&M), and any of its predecessors, agents, or employees.

NOTICE IS FURTHER GIVEN that the deponent(s) and their counsel will be deposed concerning the following issues:

DESIGNATED ISSUES

1. Did PUERTO RICO SUN OIL COMPANY manufacture/refine gasoline containing MTBE at the YABUCOA FACILITY.
2. Did SUNOCO blend MTBE into gasoline at the YABUCOA FACILITY.
3. Did the PUERTO RICO SUN OIL COMPANY manufacture/refine gasoline from NAPTHA? If so, what was used as an octane enhancer for gasoline in Puerto Rico.
4. Was MTBE ever used as an octane enhancer in gasoline at the PUERTO RICO SUN OIL COMPANY.
5. Did SUNOCO purchase MTBE for delivery to the YABUCOA FACILITY.
6. Did SUNOCO ever deliver MTBE to the YABUCOA FACILITY.
7. Do YOU have records concerning gasoline delivered to Puerto Rico which was manufactured/refined at the SUNOCO refinery. If so:
 - (a) did the SUNOCO refinery manufacture/refine MTBE gasoline during the time that facility sold or delivered gasoline to Puerto Rico;
 - (b) what were the product codes for gasoline delivered to Puerto Rico from the SUNOCO refinery and do those product codes indicate that MTBE was present in the gasoline;
 - (c) what were the specifications for SUNOCO gasoline delivered to Puerto Rico
8. For each shipment of MTBE to your YABUCOA FACILITY:
 - (a) the date(s) the shipment was unloaded;
 - (b) identify the storage tank(s) which stored that shipment;
 - (c) identify the quantity received, including any third party verification;

(d) provide your best estimate of the quantity of gasoline blended with that shipment of MTBE;

(e) provide your best estimate of the quantity of gasoline blended with that shipment of MTBE, the dates you used that shipment of MTBE to blend gasoline, and identify the batch numbers of gasoline produced from that shipment of MTBE (or other identifying numbers involved);

(f) provide your inventory and/or inventory reconciliation records concerning the storage tank(s) described above, including, but not limited to:

- the amount of MTBE present in the tank(s) before the MTBE shipment was received;
- the amount of MTBE present in the tank(s) after the MTBE shipment was received immediately before the next shipment of MTBE was added to the same tank; and/or
- the gasoline manufactured/refined using that shipment of MTBE.

(g) identify all documents concerning the specifications of gasoline manufactured/refined at the YABUCOA FACILITY, including

- the percentage of the product which consisted of MTBE, TBA, or other constituents and/or ingredients.

(h) provide a copy of the records provided to you by any MTBE supplier concerning each shipment of MTBE to the YABUCOA FACILITY.

(i) identify each person or business who supplied each shipment of MTBE to YOUR YABUCOA FACILITY.

9. Did SUNOCO receive MTBE at any marine terminal in Puerto Rico.

10. For each shipment of MTBE to a marine terminal in Puerto Rico that SUNOCO received, please state:

- (a) the date(s) the shipment was unloaded;
- (b) identify the storage tank(s) which stored that shipment;
- (c) identify the quantity received, including any third party verification;
- (d) provide your best estimate of the quantity of gasoline blended with that shipment of MTBE;
- (e) provide your best estimate of the quantity of gasoline blended with that shipment of MTBE, the dates you used that shipment of MTBE to blend gasoline, and identify the batch numbers of gasoline produced from that shipment of MTBE (or other identifying numbers involved);
- (f) provide your inventory and/or inventory reconciliation records concerning the storage tank(s) described above, including, but not limited to:
 - the amount of MTBE present in the tank(s) before the MTBE shipment was received;
 - the amount of MTBE present in the tank(s) after the MTBE shipment was received immediately before the next shipment of MTBE was added to the same tank; and/or
 - the gasoline manufactured/refined using that shipment of MTBE.
- (h) provide a copy of the records provided to you by any MTBE supplier concerning each shipment of MTBE to YOU at a marine terminal in Puerto Rico.
- (i) identify each person or business who supplied each shipment of MTBE to YOUR YABUCOA FACILITY.

11. Identify all documents concerning the specifications of gasoline made at the YABUCOA FACILITY, including:
 - the percentage of the product which consisted of MTBE, TBA, or other constituents and/or ingredients.
12. Identification of all MTBE and oxygenated gasoline product codes that YOU used in Puerto Rico.
13. Identification of all managers of the YABUCOA FACILITY during YOUR ownership or control of that facility.
14. Identification of all MTBE suppliers to the YABUCOA FACILITY.
15. Identification of the date PUERTO RICO SUN OIL COMPANY first manufactured gasoline containing MTBE.
16. Identification of the date PUERTO RICO SUN OIL COMPANY last manufactured gasoline containing MTBE.
17. Identification of all exchange agreements and exchange partners related to the PUERTO RICO SUN OIL COMPANY.
18. Please describe in detail the last person(s) who had custody and control over the business records maintained by the PUERTO RICO SUN OIL COMPANY.
19. Identify all documents, facts and witnesses to support any contention that SUNOCO did not supply gasoline containing MTBE to Puerto Rico.
20. Did SUNOCO sell SUNOCO branded gasoline in Puerto Rico? If so, when.
21. Did SUNOCO approve/control specifications for gasoline sold under the SUNOCO brand name in Puerto Rico? If so, how and/or when.

22. Did PUERTO RICO SUN OIL COMPANY purchase gasoline from SUNOCO INC. and/or SUNOCO INC. (R&M) under the terms of any licensing agreement or any sales contract for branded products.

REQUEST FOR PRODUCTION OF DOCUMENTS

NOTICE IS FURTHER GIVEN that each Defendant is required by Rule 34 of the Federal Rules of Civil Procedure and the Case Management Order Protocol Governing Rule 30(b)(6) Depositions dated December 6, 2012 to produce at least seven (7) business days prior to the commencement of the deposition documents responsive to the topics listed below. To the extent each Defendant has already produced responsive documents and does not have any additional or supplemental information, it is not necessary to reproduce such documents in conjunction with the deposition.

1. Documents that mention, concern, or refer to any transaction wherein YOU sold MTBE to any refinery and/or business listed in Attachment 1 (including, but not limited to, bills of lading, transportation receipts, marine transportation documents, billings sent to YOUR customer, records concerning the amount acknowledged as delivered at a refinery and/or marine terminal in Puerto Rico and any other records, emails, or contracts which documents, mention, refer to or concern the sale of MTBE to a refinery and/or business listed in Attachment 1 (hereinafter collectively referred to as "Puerto Rico customers").

2. Any Material Safety Data Sheets or other documents provided to YOUR Puerto Rico customers concerning any sale of MTBE.

3. Any and all agreements and/or requirements contracts for the purchase, sale, acquisition, delivery, and/or exchange of MTBE with YOUR Puerto Rico customers.

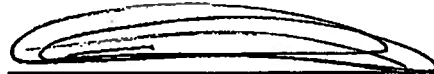
4. Documents which mention or concern the identity of any purchaser,

supplier, distributor and/or any other person who purchased MTBE from YOU in Puerto Rico.

5. Any summaries prepared by the witness which reflect or refer to sales of MTBE by SUNOCO delivered to Puerto Rico.
6. All summaries which reflect the sale and/or supply of MTBE to Puerto Rico marine terminals and/or customers.
7. All documents which concern deliveries of MTBE to any defendant in this case (*Commonwealth of Puerto Rico, et al. v. Shell Oil Co., et al., Case No. 07-CIV-10470 (SAS)*).
8. All documents which reflect or refer to any warnings, and/or information YOU provided to any defendant in this case (*Commonwealth of Puerto Rico, et al. v. Shell Oil Co., et al., Case No. 07-CIV-10470 (SAS)*) regarding potential environmental hazards associated with the use or handling of MTBE or gasoline containing MTBE.
9. All documents read, reviewed and/or considered by the deponent concerning any designated issue in this notice.

MILLER, AXLINE & SAWYER
Attorneys for Plaintiffs

Dated: October 11, 2013



Duane C. Miller, Esq.
Miller, Axline & Sawyer
1050 Fulton Avenue, Suite 100
Sacramento, CA 95825-4225